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*Attorneys for Defendants C. R. Bard, Inc. and
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**THE PARTIES' JOINT
SUBMISSION REGARDING
PRIVILEGE LOG ISSUES**

**PURSUANT TO CASE
MANAGEMENT ORDER NO. 10**

In accordance with Case Management Order no. 10 [Doc. 1319], the Parties are continuing the meet and confer process. Plaintiffs are in the process of categorizing the privilege log entries that they are challenging at this time. Bard is currently reviewing the challenges provided by Plaintiffs. The parties have agreed to a meet and confer process on a log by log basis, while at the same time addressing similar documents as a group to resolve as many of the challenges as expediently as possible.

Before the parties can fully answer the Court's inquiry in CMO No. 10 regarding the challenges that can be resolved and the number of documents that remain in dispute, the parties need guidance from the Court as to which law applies and the scope of that application. The parties have briefed this fully [Doc # 1214, Doc # 1476, and Doc #1590.] Direction from the Court through resolution of the parties' briefing on privilege issues will hopefully allow for substantial resolution of privilege log entry challenges. In the interim and pursuant to the Court's instruction in CMO No. 10, the parties are proceeding with categorizing Plaintiffs' challenges and meeting and conferring on those groupings to narrow the scope and number of Plaintiffs' challenges.

(Signatures on Following Page)

1 DATED this 27th day of May 2016.

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14 **CERTIFICATE OF SERVICE**

15 I hereby certify that May 27, 2016, the foregoing was electronically filed with the
16 Clerk of Court using the CM/ECF system which will automatically send email notification
17 of such filing to all attorneys of record.

18
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